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U.S. DISTRICT COURT
DISTRICT OF MASS.

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**VIA FACSIMILE AND
FIRST-CLASS MAIL**

The Honorable Reginald C. Lindsay
United States District Court for the
District of Massachusetts
John Joseph Moakley U.S. Courthouse
1 Courthouse Way - Suite 2300
Boston, MA 02210
Facsimile: (617)748-9096

Re: *Consolidated Actions:*

Iron Mountain, et al. v. Carr, Civil Action No. 05 10890 RCL

Iron Mountain, et al. v. Systrans Freight Systems, Inc., Civil Action No. 05 10999 RCL

Dear Judge Lindsay:

We very much enjoyed meeting you last week. This letter is in response to your request that the parties consider the appointment of a discovery master in the above-referenced action. We have attempted to contact Sam Miller, counsel for the Plaintiffs, but have been unsuccessful. As a result, we are unclear as to their opinions on this matter. We have conferred with our clients and they have determined that it is not financially feasible for them incur the additional expense of a discovery master. Moreover, while some dispute is inevitable, it is our hope that counsel for both sides can work together to achieve the efficient and effective resolution of any such disagreement.

Respectfully yours,



Read K. McCaffrey

cc: Ira Gross, Esq. (via first-class mail)
Sam Miller, Esq. (via first-class mail)